

**Internal Revenue Service
Criminal Investigation**

Memorandum of Conversation

In Re: LINDSEY SPRINGER **Location:** IRS Office
Tulsa, Oklahoma

Investigation #: 750530384
Date: August 18, 2009
Time: 10:20-10:33AM
Participant(s): OSCAR STILLEY, Defendant
Charles O'Reilly, SAUSA
Brian Shern, Special Agent

On the above date and approximate time, Special Agent Brian Shern received a telephone call from OSCAR STILLEY. STILLEY told SA Shern he had Charles O'Reilly on the other line and wished to start a conference call. SA Shern agreed and the conference call was initiated. The following information was obtained:

1. STILLEY wanted to know the specific amounts of tax due and owing that LINDSEY SPRINGER was alleged to have evaded in the indictment for each year. SA Shern provided these amounts to STILLEY. The amounts were by tax year as follows:

2000 - \$33,777
2001 - \$573
2002 - \$0
2003 - \$89,350
2004 - \$0
2005 - \$33,463


SAUSA O'Reilly mentioned to STILLEY that these figures had already been provided to him in the discovery materials. SAUSA O'Reilly also told STILLEY that not all of the years were being charged as tax evasion due to the amount of tax due and owing.

2. STILLEY said he wanted to clarify what he was being charged with in the conspiracy, and asked if he was charged with conspiracy for assisting SPRINGER evade the amounts above. SAUSA O'Reilly explained that the conspiracy was broader than that, and included impairing the IRS' ability to ascertain, assess and collect LINDSEY SPRINGER'S Federal income tax obligations, which included the amounts above. SAUSA O'Reilly also explained that a conspiracy to defraud involves impeding and impairing, through dishonest

means, the functions of the government.


3. SA Shern and SAUSA O'Reilly also stated that the amounts above may change based on the evidence reviewed. STILLEY acknowledged that the amounts may change, and asked if the changes would be that material. SAUSA O'Reilly stated that the changes, if any, were unlikely to be material.
4. After some discussion about what STILLEY was being charged with in relation to the conspiracy to defraud the United States, STILLEY said he thought he understood now, and thanked SAUSA O'Reilly and SA Shern. The conference call was then concluded.

I certify that this memorandum contains all pertinent facts discussed during the conversation with Oscar Stilley.



Brian M. Shern
Special Agent

I prepared this memorandum on August 18, 2009, after refreshing my memory from notes made during and immediately after the conversation with Oscar Stilley.



Brian M. Shern
Special Agent